



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

UAD
F. #2012R00387

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 16, 2016

By Hand and ECF

The Honorable Sterling Johnson, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Sevinj Taghiyeva
Criminal Docket No. 12-626 (SJ)

Dear Judge Johnson:

The government respectfully submits this letter in advance of the sentencing of the defendant Sevinj Taghiyeva, which is scheduled for June 23, 2016.

Taghiyeva was employed as a contract administrator at ARC Electronics, Inc. ("ARC") from May 2011 until her arrest in October 2012. (Presentence Investigation Report ("PSR") ¶ 5). The government's investigation showed that Taghiyeva frequently provided ARC's vendors with false end user information in order to obtain quotes for products her Russian clients asked her to acquire. The investigation also showed that she knowingly provided false end user information on at least two occasions to purchase products. The items she purchased did not require a license to export to Russia. As she was trained to do by Alexander Fishenko and Alexander Posobilov, Taghiyeva also frequently lied to vendors and told them ARC was a contract manufacturer.

On August 28, 2015, Taghiyeva pleaded guilty pursuant to a plea agreement to Count Two of the Superseding Indictment, which charged her with conspiracy to commit export violations and wire fraud. (PSR ¶ 1). Taghiyeva allocuted specifically to conspiracy to commit wire fraud. The government agrees with the Probation Department that the total offense level is 2 and that the applicable United States Sentencing Guidelines Range is 0-6 months. (PSR ¶¶ 68, 102).

Pursuant to paragraph 2 of the plea agreement, the government recommends a sentence of time served.

Respectfully submitted,

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